Uintah Basin Electronic Telecommunications d/b/a UBET Wireless 3843 South Highway 40 P.O. Box 157 Roosevelt, Utah 84066

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 01-309
HAC Digital Wireless Telephones

First Semi-Annual Report

Dear Ms. Dortch:

The Filer, Uintah Basin Electronic Telecommunications d/b/a UBET Wireless, is the licensee of Cellular Radiotelephone Service Station KNKN236; and of Broadband Personal Communications Service ("PCS") Stations KNLG530, WPQZ730, WPQZ731 and WPSZ758. This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background information, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer provides Frequency Block B cellular service to the B2 Segment of the Utah 5 – Carbon RSA; and Broadband PCS service within the Rock Springs, Wyoming, Grand Junction, Colorado, Denver, Colorado and Salt Lake City – Ogden, Utah BTAs. The digital portion of the Filer's cellular system employs the Time Division Multiple Access ("TDMA") air interface; and the Filer's Broadband PCS systems employ the Code Division Multiple Access ("CDMA") air interface. The Filer currently markets the following digitial wireless telephones: A) Motorola Models 120E, T731, and V60si; B) Kyocera Models 2325, KE414, KE424, 3245, and 7135; C) Nokia Model 3586i; and D) LG Models VX3100 and VX4400. Upon information and belief, none of these units meets a U3 or U3T rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility ("HAC") requirements of the <u>R&O</u>, the Filer is literally at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, must rely on the

manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

- Item 1 -- Digital Wireless Phones Tested: The Filer has not tested any digital wireless telephones for HAC compliance. All testing will be done by the handset manufacturers.
 - Item 2 -- Laboratory Used: None. See Response to Item 1.
- Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item 1.
- Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: Upon information and belief, none of the handsets marketed by the Filer meet a U3 or U3T rating under ANSI Standard C63.19.
- Item 5 -- Report On The Status Of Product Labeling: None. It is anticipated that product labeling will be handled by the handset manufacturers.
- Item 6 -- Report On Outreach Efforts: The Filer is developing a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs.
- Item 7 -- Information Related To Retail Availability of Compliant Phones: Upon information and belief, there are currently no handsets commercially available that meet a U3 or U3T rating under ANSI Standard C63.19.
- Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.
- Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None.
- Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: Upon information and belief, there are currently no handsets commercially available that meet a U3 or U3T rating under ANSI Standard C63.19. The digital wireless phone models marketed by the Filer are as set forth in the second paragraph of this report; and, upon information and belief, none of these models meet a U3 or U3T rating under ANSI Standard C63.19.

Item 11 — Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: Interoperability testing will be performed by the handset manufacturers.

Very truly yours,

Uintah Basin Electronic Telecommunications d/b/a UBET Wireless

Dated: May 14, 2004

Bruce H. Todd General Manager

In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:

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